

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

GRANT HUDGENS, JACOB  
COOPER, WALTER OWEN, on their  
own behalf and on behalf of those  
similarly situated,

Case No. 1:23-cv-03077-MLB

Plaintiffs,

v.

JB TECHNOLOGIES, LLC, MICHAEL  
S. BRUTON, Individually, and  
THOMAS BRUTON, Individually

Defendants.

---

**SPIRE LAW FIRM’S AND IAN SMITH’S RESPONSE**  
**TO THE COURT’S ORDER [DOC. 16]**

Now Comes the Spire Law Firm and Ian Smith, undersigned counsel for Defendants, JB Technologies, LLC, Michael S. Bruton, and Thomas Bruton (“Defendants”), who respond to the Court’s Order directing Counsel for Defendants to file “within fourteen (14) days from the entry of th[e] Order, to file a motion to withdraw that complies with the Local Rules of Civil Procedure,” as follows:

1. On October 2, 2023, the Court directed counsel for Defendants to serve a notice complying with L.R. 83.1E(2)(b) on Defendant Thomas Bruton personally or at Mr. Bruton’s last known address. [Doc. 16.]

2. The Court further directed counsel for Defendants to file “within fourteen (14) days from the entry of th[e] Order, ... a motion to withdraw that complies with the Local Rules of Civil Procedure.” [*Id.*]
3. Local Rule 83.1E(2)(b) requires an attorney seeking withdrawal to, inter alia, state within his motion to withdraw “that the attorney has given the client 14 days’ notice of the attorney’s intention to request permission to withdraw.”
4. On October 12, 2023, counsel for Defendants provided a notice, via certified mail with return receipt requested, complying with L.R. 83.1E(2) to all Defendants, including Thomas Bruton. A copy of the Notice is attached as Exhibit A.
5. A copy of the Notice was also provided to Defendants JB Technologies, LLC and Michael Bruton via email and U.S. Mail.
6. Based on the United States Postal Service tracking service, counsel’s notice was delivered to Thomas Bruton on October 14, 2023.
7. The 14-day notice period required under L.R. 83.1E(2)(b) expires on October 28, 2023.
8. Accordingly, counsel for Defendants will file an Amended Motion to Withdraw as Counsel on or after October 29, 2023.

Respectfully submitted this 16th day of October 2023,

Spire Law, PLLC  
2572 W. State Road 426, Suite 2088  
Oviedo, Florida 32765

By: /s/ Ian E. Smith  
Ian E. Smith, Esq,  
Georgia Bar No. 661492  
[ian@spirelawfirm.com](mailto:ian@spirelawfirm.com)  
[sarah@spirelawfirm.com](mailto:sarah@spirelawfirm.com)  
[filings@spirelawfirm.com](mailto:filings@spirelawfirm.com)  
*Attorneys for Defendants.*

**CERTIFICATE OF SERVICE**

I certify on this day I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will automatically send electronic mail notification of such filing to all counsel of record.

/s/ Ian Smith  
Attorney